

bankruptcy case, the United States Bankruptcy Court for the Eastern District of Texas, Sherman Division.

4. On December 5, 2023, this Court entered an order (Adv. Docket No. 8) that set a deadline of December 18, 2023 for the Defendants to respond to the pending Motion to Remand (Adv. Docket. 5).

5. The parties further agree to extend the deadline for Defendants to respond to the pending Motion to Remand (Adv. Docket. 5) to January 15, 2024.

6. Accordingly, the parties respectfully request that this Court approve and enter the proposed form of Stipulation and Agreed Order Attached hereto.

CONCLUSION AND PRAYER

WHEREFORE, Plaintiff and Defendants jointly request that the Court:

- (1) transfer venue of this case to the United States Bankruptcy Court for the Eastern District of Texas, Sherman Division;
- (2) cancel the hearing set for December 20, 2023; and
- (3) extend the deadline for the Defendants to respond to the Motion to Remand to January 15, 2024.

The parties respectfully request such other and further relief to which the parties are entitled at law or in equity.

Dated: December 18, 2023

Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth

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DEFENDANT AND DEBTOR IN POSSESSION

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COUNSEL TO SALT & PEPPER RESTAURANTS
LLC

By: /s/ Timothy Dungan*

Timothy Dungan, Pro Se

** signature by permission by Jeff Carruth*

PROPOSED ORDER

4. Venue of this action is hereby transferred to the United States Bankruptcy Court for the Eastern District of Texas, Sherman Division
5. The deadline for Defendants to respond to the Motion to Remand (Adv. Docket. 5) is **January 15, 2024**.
6. The hearings in this Court set for December 20, 2023 (Adv. Docket Nos. 3, 8) are cancelled.

Dated: _____

THE HONORABLE JEFFREY P. NORMAN
UNITED STATES BANKRUPTCY JUDGE

Submitted by:

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AGREED:

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